

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

Architecttura, Inc.)	
Plaintiff)	
v.)	
)	
Mission Village of Pecos, LLC,)	Cause No. _____
Mission Village of Pecos MM, LLC ,)	
Louie Lange, III, Michael P. Ash and)	
Texas Department of Housing and)	
Community Affairs)	
Defendants)	

COMPLAINT and JURY DEMAND

1. Plaintiff, Architecttura, Inc., is a Texas corporation with its principal place of business in Collin County, Texas.

2. Defendant, Mission Village of Pecos, LLC is a Wisconsin LLC located at 54 E. First Street, Fond Du Lac, Wisconsin 54935 with a registered agent in CSC at 211 7th Street, Suite 620, Austin Texas 78701.

3. Defendant, Mission Village of Pecos MM LLC is a Wisconsin LLC located at 54 E. First Street. Fond Du Lac, Wisconsin 54935 with a registered agent in CSC at 211 7th Street, Suite 620, Austin Texas 78701.

4. Louie Lange III. Ash is the owner of the membership interests in the above LLCs. He may be served at 54 E. First Street. Fond Du Lac, Wisconsin 54935.
5. Michael Phillip Ash is an individual located at 1535 Camino Lago, Irving, Texas 75039.
6. Texas Department of Housing and Community Affairs is a Texas entity which may be served by serving its executive director, Tim Irvine, 221 E. 11th Street, Austin, Texas 78701.
7. Jurisdiction is proper under 28 USC 1338 and 1367.
8. Upon information and belief venue is proper in the northern district of Texas because Irving, Texas was the place where a substantial part of the events giving rise to this action occurred. 28 USC 1391(b)(2).
9. Plaintiff, Architecttura, is the owner of two site plans for construction of buildings and amenities. Plaintiff has applied for registration with the United States Copyright Office for these amenities. Plaintiff has filed the proper applications and filed the proper fees required which have been delivered to the Copyright Office. A copy of these registration applications is attached as Exhibits A and B. These documents will with this complaint be

served upon the Register of Copyrights located at 101 Independence Ave. S.E., Washington, D.C. 20540-1000.

10. In January 2013, Plaintiff was engaged by Mike Ash, agent for all defendant LLCs and Louis Lange to design a project in Pecos Texas to be called Mission Village of Pecos.
11. This project was to be funded in part by the Texas Department of Housing and Community Affairs tax credit program and by the US Department of Housing and Urban Development (HUD).
12. As part of this application, Plaintiff created site plans to be used for Mission Village of Pecos, located in Pecos, Texas.
13. Defendants, LLCs and Ash used Plaintiff's original copyrighted work in the application to Texas Department of Housing and Community Affairs (TDHCA). In turn, TDHCA and HUD approved the project.
14. Defendant TDHCA then took Plaintiff's copyrighted work and copied it and, among other things, posted it upon its website.
15. Plaintiff also produced site plans and building plans which were used by the LLC and Lange Defendants to obtain funding from the TDHCA. Some of these plans were not registered with the United States Copyright Office.

16. Defendants had possession of all Plaintiff drawings and plans which then were submitted to the TDHCA. Defendants then used the copyrighted work to develop the Mission Village of Pecos. Thus, Defendants had the opportunity to copy Plaintiff's copyrighted material and did copy and use such material.

17. In copying Plaintiff's intellectual property Defendants have committed copyright infringement.

18. In using other plans and drawings not yet registered, Defendants have benefited from Plaintiff's work. Plaintiff is entitled to quantum merit for his work.

JURY DEMAND

19. The Plaintiff demands a jury trial.

PRAYER

20. Plaintiff seeks a judgment for damages as may be provided by law with pre and post judgment interest as may be provided by law. Plaintiff also seeks attorneys for it quantum merit claims.

Respectfully submitted,

/s/ Mark J. Zimmermann

Mark J. Zimmermann

TX Bar No. 22276420

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ATTORNEYS FOR PLAINTIFF